

Response: Collateral source information is as follows:

Medicare
Baltimore, MD 21244-1850
Member No.: 094304297B
See enclosed authorization for collateral source.

United Health Care
P.O. Box 740801
Atlanta, GA 30374-0801
Member ID: 878079760
Group #: 310000
See enclosed authorization for collateral source.

As to the exact amounts paid by collateral source, we are not in possession of this information, however, authorizations to obtain collateral source information are enclosed.

19. State the amounts of any liens which have been asserted against Plaintiff's recovery in this lawsuit as well as the basis thereof and the dates when and parties by which said liens were asserted.

Response: At this time we are not aware of the amount of any liens. Pursuant to Rule 26(e)(1) supplemental responses will be made when the information is known.

20. State whether Plaintiff consumed any alcohol, prescription or non-prescription drugs during the twenty-four (24) hours preceding the occurrence.

Response: The plaintiff, MARIA HOLZHAUER, did not consume alcohol within the twenty-four (24) hours preceding the occurrence. This plaintiff was on the following prescription medications at the time of the occurrence herein: Effexor; Toprol; Norvasc; Lyzaar; and Nexium.

21. State the exact manner in which this incident allegedly occurred.

Response: The manner in which the accident occurred is that the defendants negligently, wantonly, recklessly and carelessly placed a display rack in such a manner